



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

May 23, 2014

VIA EMAIL

Mr. Michael Parsons
Bedford Recycling, Inc.
904 Summit Lane
Bedford, IN 47421

Dear Mr. Parsons:

Re: Violation/Return to Compliance Letter
Bedford Recycling, Inc.
EPA ID#: IND040292237
Bedford, Lawrence County

On April 30, 2014 a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted a complaint inspection of Bedford Recycling located at 904 Summit Lane Bedford, IN 47421. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection:	<u>x</u>	Other: <u>Complaint</u>
Results of Inspection:	<u>x</u>	Violations were observed during the inspection, but have since been corrected. See enclosed inspection report for details.

Please direct any response to this letter and any questions to Phil Guntle at (317) 753-9631, or via email at pguntle@idem.in.gov. Thank you for your attention to this matter.

Sincerely,

Theresa Bordenkecher, Chief
Industrial Waste Compliance Section
Compliance and Response Branch
Office of Land Quality

Enclosure

cc: Lawrence County Health Department

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF LAND QUALITY
Complaint Inspection**

EPA ID # IND040292237
NAME: Bedford Recycling
ADDRESS: 904 Summit Lane
CITY & COUNTY: Bedford, Lawrence County
INSPECTION DATE: April 30, 2014
INSPECTOR(S): Phil Guntle, Alan Minne

PERSONS INTERVIEWED

Michael Parsons

TITLE

Engineer

TELEPHONE

812-278-0386

PRE-INSPECTION INFORMATION

On April 16, 2014 a complaint was received by IDEM indicating that the facility was potentially dumping oil, antifreeze, & other contaminants all over their scrap yard. Prior to this complaint, IDEM had been to this facility five times since 2007 for various environmental compliance inspections.

INSPECTION FINDINGS

On April 30, 2014 staff conducted an inspection of the facility and met with Mr. Parsons, who is an engineer for the facility but also oversees their environmental compliance. Mr. Parsons took staff to the area where fluids are drained from their vehicles before being shredded. Staff noticed several areas where fluids were released onto the soil. Staff recommended the facility maintain a plan of action for when spills occur (*See attached Photo Log for pictures of this area.*). On the other side of the yard, staff noticed the facility storing several hundred tires on rims, which Mr. Parsons said they are selling as used tires. Staff explained to the facility that as long as the tires are stored in piles that they probably be considered waste. Staff asked for a receipt and photo once the tires were sold in order to show that the facility was not storing waste tires without a storage registration.

On May 9, 2014 the facility emailed IDEM with documentation showing the cleanup of the spill area. See attached email from Mr. Parsons including photos and other documents for details.

CONCLUSIONS AND RECOMMENDATIONS

Based on the information gathered at the time of the inspection, violations were found at the facility but were later demonstrated to be corrected via email correspondence showing a photo of the fluid releases being cleaned up. This email is attached to report with copies of photos provided in the email.

Description of Violations	
Facility Name: Bedford Recycling, Inc.	EPA ID#: IND040292237
Facility Address: 900 Summit Lane Bedford, Lawrence County	Inspection Date: April 30, 2014
<p>Fluids Management</p> <p>IC 13-30-2-1(4): Specific Acts Prohibited. A person may not allow the deposit of any contaminants or solid waste upon the land or into the environment except as allowed through regulation. 329 IAC 10-4-1,</p> <p>329 IAC 10-4-2, 329 IAC 10-4-3, 329 IAC 10-4-4: Open dumps are prohibited and must be remediated.</p> <p>329 IAC 10-4-1: Purpose Sec. 1. The purpose of this rule is to implement the provisions of the following: (1) IC 13-30-2-1(3) and IC 13-30-2-1(4) relating to the deposit of contaminants or solid waste upon the land except as permitted in this article. (2) IC 13-30-2-1(5) and IC 36-9-30-35 prohibiting dumping, causing, or allowing the open dumping of garbage or of other solid waste in violation of this article.</p> <p><i>Note: Several fluid releases were evident near the vehicle draining area, at the time of the inspection.</i></p> <p>Status Update 5-9-14 – Returned to compliance. The spills noted during the April 30, 2014 inspection were cleaned up and documentation submitted to IDEM showing the area cleaned up. The area is on a concrete pad so oil dry was applied and swept up to be disposed of to Rumpke.</p>	
<p align="center">Additional Comments</p> <p>Please submit documentation to IDEM showing that the tires on your facility are not being stored for long periods of time. Any receipt, bill of sale, or other purchasing agreement along with a photo showing this progress would be adequate to show this progress. Failure to submit this documentation may result in additional violation(s).</p>	

Photo Log

Picture 1



Facility Name: Bedford Recycling

Photographer: Phil Guntle

Date & Time: 4-30-14

Others Present: Alan Minne (IDEM), Mr. Michael Parsons

Location & Description: Crushed and stacked vehicles.

Picture 2



Facility Name: Bedford Recycling

Photographer: Phil Guntle

Date & Time: 4-30-14

Others Present: Alan Minne (IDEM), Mr. Michael Parsons

Location & Description: An expanded view of the area where vehicles are crushed.

Photo Log

Picture 3



Facility Name: Bedford Recycling

Photographer: Phil Guntle

Date & Time: 4-30-14

Others Present: Alan Minne (IDEM), Mr. Michael Parsons

Location & Description: Fluid removal area for the vehicles.

Picture 4



Facility Name: Bedford Recycling

Photographer: Phil Guntle

Date & Time: 4-30-14

Others Present: Alan Minne (IDEM), Mr. Michael Parsons

Location & Description: A view of the oil / water separator behind the drums of fluid.

Guntle, Phillip

From: Michael Parsons [mparsons@bedfordrecycling.com]
Sent: Friday, May 09, 2014 3:13 PM
To: Guntle, Phillip
Subject: Checksheet and Car Drainage Pictures
Attachments: Car Drainage Checksheet.jpg; Car Rack Drainage Area.jpg

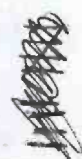
Phil,

Sorry this took so long. Was waiting for confirmation on the what the status of the tire pile was. Here is the information you requested.

Attached are the car drainage daily checksheet and the picture of the drainage area you requested. Our suppliers sign a supply contract stating that the freon has been removed. Our plan is to sell all the tires in the tire pile. We have sold one truck load and the buyer says he is interested in all of them, even the ones with less tread left on them. I don't know if it makes a difference but the wheels are still on them so they may not be a water trap the way that a tire off the rim would be. The ones that are off the rim and prepped for sale are stored indoors.

Thanks,

Michael Parsons
Bedford Recycling
812-278-0386



Revision Date: 6/14/2013



Process Review once each day by car drainer		Process Review once each week by car drainer		Process Review once each month by the Yard Manager		Car Drainer Findings		Yard Manager Findings	
Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Problem Description	Corrective Action	Initial and date CA review
Fork Truck Driving Area Clear of Debris									
All trash in area picked up and in proper container									
Fire extinguisher present, access unobstructed, full, not expired									
No items out of place in tool box (no items in tool box that shouldn't be)									
All storage containers marked, only being used for what they are marked for									
No full totes, all totes properly labeled and in good condition, no risk of leaking									
Batteries stored correctly and put away, full sticks sent up front									
All drainage containers emptied into totes, totes heavy their lids on									
General Housekeeping: No items out of place, no unneeded items, generally tidy									
Cart Conv, Rads, etc locked up									
Number of vehicles drained	13	11							
No items out of place in the area, items needed are there in labeled locations, items not needed are not in area									
No items out of place in toolbox, tools needed are there, tools not needed are no needed									
Rack is in good condition with capacity marking clearly legible									
Oil separation pit not in danger of overflowing									
Mercury spill kit present									
Audit that conditions in the area meet the requirements on this form									

215 K 215
 T.C. on hand

215 K 215
 T.C. on hand



This is to notify you that on 7/30/14 an inspection of Bedford Recycling
_____ was conducted by the undersigned representative of the Indiana Department
of Environmental Management (IDEM), Office of Land Quality.

Type of Inspection (may include more than one):

- ☒ Complaint
☐
☐
☐
- ☐ Complaint
☐ Multi-Media Screening Evaluation
☐ Other

Preliminary Inspection/Screening Findings:

These findings are considered preliminary and identify specific compliance issues discovered during the above-noted inspection that the designated agent of IDEM believes may be a violation of a statute(s), rule(s) or permit(s) issued by IDEM.

Single Media Inspection:

- ☐ No violations were discovered with respect to the particular items observed during the inspection.
☐ Violations were discovered but corrected during the inspection.
☐ Violations were discovered and require a submittal from you and/or follow-up inspection by IDEM.
☐ Violations were discovered and may subject you to an appropriate enforcement response.
☒ Additional information/review is required to evaluate overall compliance.
☐ Other / Comments (attachment may be included)

Multi-Media Screening (Please note that a multi-media screening is not a comprehensive evaluation of the compliance status of the facility):

- ☒ Multi-media screening not conducted.
☐ No violations were discovered with respect to the limited multi-media screening conducted by IDEM.
☐ Potential violations were discovered but corrected during the inspection.
☐ Potential violations were discovered and may be further investigated.

Pollution Prevention:

Pollution prevention is the preferred means of environmental protection in Indiana. The goal of pollution prevention is to promote changes in business and commercial operation, especially manufacturing processes, so that Indiana businesses increase productivity, generate less environmental wastes, reduce their regulatory responsibilities and become more profitable. Your participation in Indiana's pollution prevention program is entirely voluntary. If you have any pollution prevention questions, you may contact our Office of Pollution Prevention and Technical Assistance (OPPTA) at (317) 232-8172 or (800) 988-7901, or visit OPPTA's Web site at www.idem.IN.gov/oppta/p2/. Would your company like to be contacted by IDEM's Office of Pollution Prevention and Technical Assistance? ☐ Yes ☒ No

Compliance Assistance:

In addition to the compliance assistance offered by IDEM's individual programs, IDEM's Compliance and Technical Assistance Program (CTAP) offers free, confidential compliance assistance to regulated entities, including small businesses and municipalities, throughout Indiana. In the future, if you would like to request free, confidential compliance assistance, call (317) 232-8172 or (800) 988-7901, or visit CTAP's Web site at www.idem.IN.gov/ctap.

A summary of violations and concerns noted during the inspection was verbally communicated to the undersigned representative during the inspection. The facility should correct any violations noted as soon as possible. Violations identified and corrected during the inspection may still be cited as violations.

A written inspection summary will be provided within 45 days. In accordance with IC 13-14-5-4, matters not evident to IDEM at the time of the inspection might not be included in either the verbal or written inspection summary.

IDEM Representative:

Printed Name	Signature	Phone Number	Date	Time
Phil Guntz		317-753-9631	4/30/14	In: 8:00 AM Out: 11:15 AM

Owner/Agent Representative:

Printed Name	Signature	Title	Phone Number	Date
Michael Parsons	Michael Parsons	Engineer	812-278-0386	4-29-14

From: [Michael Parsons](#)
To: [Hill, Kae](#)
Cc: [Michael Parsons](#); [Guntle, Phillip](#); [Bordenkecher, Theresa](#); bcummins@lawrencecounty.in.gov
Subject: Re: Bedford Recycling
Date: Friday, May 23, 2014 3:03:27 PM

I have received the report.

Thank You,

Michael

On May 23, 2014, at 1:26 PM, "Hill, Kae" <khill@idem.IN.gov> wrote:

Dear Mr. Michael Parsons

Please find attached documents based on an inspection the Indiana Department of Environmental Management, Office of Land Quality, conducted on April 30, 2014, please review the documents and respond back to me (via-email) to let me know you received the documents.

Thank you

Kae Hill
Administrative Assistant
Department of Environmental Management
Office of Land Quality
IGCN, Rm 1101
317-234-6951
khill@idem.in.gov

<47 - IW - Bedford Recycling Inc - INX000011544 - AI ID36301 - 4-30-14 - COI - (Phil).pdf>